

# **EXHIBIT A**

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11 *Color CRT Co., Ltd.*

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
15

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

18 This Document Relates to:

19 The Indirect-Purchaser Action;

20 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
21 *No. 11-cv-05513;*

22 *Electrograph Systems, Inc. et al. v. Hitachi,*  
23 *Ltd., et al., No. 11-cv-01656;*

24 *Sears Roebuck and Co. et al. v. Chunghwa*  
*Picture Tubes, Ltd., et al., No. 11-cv-05514;*

25 *Target Corp., et al. v. Chunghwa Picture*  
26 *Tubes, Ltd., et al., No. 11-cv-05514;*

27 *Tech Data Corporation, et al. v. Hitachi, Ltd.,*  
*et al., No. 13-cv-00157;*

28 *ViewSonic Corporation, v. Chunghwa Picture*

No. 3:07-cv-5944 SC  
MDL No. 1917  
Judge: Hon. Samuel Conti

**OBJECTIONS AND RESPONSES OF  
DEFENDANT BEIJING MATSUSHITA  
COLOR CRT CO., LTD. TO INDIRECT-  
PURCHASER PLAINTIFFS' FIRST SET  
OF INTERROGATORIES**

**OBJECTIONS AND RESPONSES OF DEFENDANT BMCC TO INDIRECT-PURCHASER PLAINTIFFS'  
FIRST SET OF INTERROGATORIES**

(Case No. 3:07-cv-5944-SC; MDL No. 1917)

*Tubes, Ltd., et al., 3:14cv-02510*

PROPOUNDING PARTIES: Indirect-Purchaser Plaintiffs  
RESPONDING PARTY: Beijing Matsushita Color CRT Co. Ltd.  
SET NO.: ONE (1)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Beijing Matsushita Color CRT Co., Ltd. ("BMCC") responds and objects to Indirect-Purchaser Plaintiffs' ("Plaintiffs'")<sup>1</sup> First Set of Interrogatories dated August 1, 2014.

**PRELIMINARY STATEMENT**

The following objections and responses are based upon the information currently known and reasonably available to BMCC given the following:

1. BMCC never manufactured or sold CRT Products.
2. BMCC manufactured CRTs only in China.
3. BMCC never had any subsidiaries, offices, branches, employees or assets in the United States.
4. BMCC did not sell CRTs in the United States.
5. BMCC ceased manufacturing CDTs in 1999.
6. BMCC shut down all of its manufacturing operations in 2009 and has sold the assets of its CRT manufacturing business.

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<sup>1</sup> BMCC understands that pursuant to a letter of August 4, 2014, Direct Action Plaintiffs with active cases against BMCC have joined the Interrogatories.

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1 7. Prior to 2004 BMCC did not have electronically stored transaction data.

2 8. Beginning in 2004, BMCC used an Oracle ERP system to store transaction data  
3 electronically. When BMCC shut down its CRT operations it terminated its  
4 Oracle license and lost access to the electronic transaction database.

5 9. BMCC no longer manufactures anything. It operates solely as a property  
6 management business.

7 10. BMCC has fewer than 150 current employees compared to the thousands of  
8 employees it had while engaged in CRT manufacturing. Many of its current  
9 employees were hired after BMCC shut down its CRT operations and were not  
10 engaged in those operations.

11 Without obligating itself to do so, except to the extent required under the Federal Rules of  
12 Civil Procedure, BMCC reserves the right to amend or supplement the responses as additional  
13 information is recalled or otherwise ascertained. BMCC reserves the right to supplement the  
14 responses subject to any applicable Order by the Court. Further, BMCC specifically reserves the  
15 right to utilize subsequently discovered information or evidence at trial.

16 The general and specific objections set forth below are intended to apply to all  
17 information provided in response to the Interrogatories. Furthermore, these responses do not in  
18 any way waive any objections by BMCC, in this or in any subsequent proceeding, on any  
19 grounds, including objections as to the competency, relevancy, materiality, privilege or  
20 admissibility of the responses, or the subject matter thereof.

21 **GENERAL OBJECTIONS**

22 BMCC asserts the following General Objections with respect to each of the  
23 Interrogatories:

24 1. BMCC objects to the Interrogatories, including the Instructions and Definitions,  
25 to the extent they seek information beyond the permissible scope of discovery or seek to impose  
26 obligations beyond those imposed by Rules 26 and 33 of the Federal Rules of Civil Procedure,  
27 the Local Rules, or an applicable Order by the Court.

28 **OBJECTIONS AND RESPONSES OF DEFENDANT BMCC TO INDIRECT-PURCHASER PLAINTIFFS'  
FIRST SET OF INTERROGATORIES**

(Case No. 3:07-cv-5944-SC; MDL No. 1917)

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IN RE: CATHODE RAY TUBE (CRT)  
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**OBJECTIONS AND RESPONSES OF  
 DEFENDANT BEIJING MATSUSHITA  
 COLOR CRT CO., LTD TO INDIRECT  
 PURCHASER PLAINTIFFS' FIRST SET  
 OF INTERROGATORIES:  
 VERIFICATION**

**VERIFICATION**

I, Ms. Wang Guoying, declare the following:

I am the Assistant General Manager of Beijing Matsushita Color CRT Co., Ltd (**BMCC**)  
 and am authorized to make this verification on behalf of BMCC.

I have read the foregoing Objections and Responses of Defendant Beijing Matsushita  
 Color CRT Co., Ltd to Indirect Purchaser Plaintiffs' First Set of Interrogatories dated August 1,

OBJECTIONS AND RESPONSES OF DEFENDANT BMCC TO INDIRECT PURCHASER PLAINTIFFS'  
 FIRST SET OF INTERROGATORIES (Case No. 3:07-cv-5994-SC; MDL 1917)

2014, and I know its contents. These responses were prepared by representatives of and counsel for BMCC, upon whom I have relied. These responses are based upon records and information thus far discovered and may contain inadvertent and undiscovered errors. Consequently, BMCC reserves the right to make any changes in these response if it appears that omissions or errors have been made or that more accurate information is available. Subject to these limitations, these responses are true to the best of my knowledge, information and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

Executed in Beijing, China on September 3, 2014

  
Wang Guoying